

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2015 DEC 30 PM 4:02

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW L. DAILEY,

Defendant.

CASE NO.
JUDGE

2:15 cr 280
Judge Marbley

**GOVERNMENT'S PLEA AGREEMENT SUBMISSION OF
ELEMENTS AND PENALTIES FOR 18 U.S.C. § 1951(a)**

I. ELEMENTS: 18 U.S.C. § 1951(a)

- First:** The defendant was a public official;
- Second:** The defendant obtained a thing of value not due him or his office;
- Third:** The defendant did so knowing that the thing of value was given in return for official action;
- Fourth:** The defendant did or attempted in any way or degree to delay, obstruct, or affect interstate commerce, or an item moving in interstate commerce; and
- Fifth:** These acts occurred within the Southern District of Ohio.

II. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: 20 years in prison, a fine of \$250,000, 3 years of supervised release, and a \$100 special assessment.

Respectfully submitted,

CARTER M. STEWART
United States Attorney



JESSICA H. KIM (0087831)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
Office: (614) 469-5715
Fax: (614) 469-5653
E-mail: Jessica.Kim@usdoj.gov